



LUCOSKY BROOKMAN LLP

101 Wood Avenue South
5th Floor
Woodbridge, NJ 08830

T – (732) 395-4400
F – (732) 395-4401

111 Broadway
Suite 807
New York, NY 10006

T – (212) 417-8160
F – (212) 417-8161

www.lucbro.com

*Application granted. No
further extensions without
exceptional good cause shown.
So ordered.*

VIA ELECTRONIC FILING:

Hon. Gary Stein
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 9A
New York, NY 10007

1/10/25 *U.S.D.* January 9, 2025

Re: Charles Kenyatta, Jr. v. Caresha Brownlee
Case No. 1:24-cv-00691-JGK-GS

Dear Judge Stein:

I represent Defendant Caresha Brownlee in the above-captioned action. I write jointly with Plaintiff Charles Kenyatta, Jr., pursuant to Fed. R. Civ. P. 6(b)(1)(A), this Court's Local Rules, and Your Honor's Individual Practices in Civil Cases, to respectfully request extensions of the following discovery deadlines: (i) the date by which all fact discovery must be completed; (ii) the date by which depositions must be completed; (iii) the date by which all expert discovery must be completed; and (iv) the date by which to meet and confer regarding expert disclosure schedules.

The original deadlines, set forth in the Case Management Plan and Scheduling Order (the "Scheduling Order," Dkt. No 25) dated July 17, 2024, were: (i) November 15, 2024 for the completion of fact discovery and depositions; (ii) December 16, 2024 to meet and confer regarding expert disclosure schedules; and (iii) January 17, 2025 for the completion of expert discovery. The parties jointly requested—and the Court granted—the following extensions for these dates: (i) January 15, 2025 for the completion of fact discovery and depositions; (ii) February 17, 2025 to meet and confer regarding expert disclosure schedules; and (iii) March 17, 2025 for completion of expert discovery.

The parties write to respectfully request a further extension of these dates. Specifically, the parties request the following extensions: (i) February 28, 2025 for the completion of fact discovery and depositions; (ii) March 28, 2025 to meet and confer regarding expert disclosure schedules; and (iii) April 28, 2025 for the completion of expert discovery.

Counsel for Ms. Brownlee reached out to Mr. Kenyatta regarding the joint filing of a protective order in this matter pursuant to Your Honor's Order dated November 8, 2024 (Dkt. No.

48). Mr. Kenyatta did not respond until December 20, 2024. The protective order was filed by the parties on December 24, 2024. The Court entered the protective order on January 2, 2024.

Respectfully, under these circumstances, good cause exists to extend these deadlines as jointly requested.

This is each party's second request for an extension with respect to discovery in this matter.

Thank you very much for your time and consideration.

Respectfully submitted,

LUCOSKY BROOKMAN LLP

/s/ Anne Melton

Anne Melton
111 Broadway, Suite 807
New York, New York 10006
(732) 395-4409
amelton@lucbro.com

**ATTORNEYS FOR DEFENDANT
CARESHA BROWNLEE**

Respectfully submitted,

Charles Kenyatta

Charles Kenyatta, Jr.
22B3002
Collins Correctional Facility
Middle Road
P.O. Box 340
Collins, NY 14034-340

PRO SE PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically filed using the Court's electronic filing system this 9th day of January, 2025, and sent to Plaintiff via first class mail at the address stated below and via email to Plaintiff's spouse and his Power of Attorney at charliecthageneral@gmail.com.

Charles Kenyatta, Jr.
22B3002
Collins Correctional Facility
Middle Road
P.O. Box 340
Collins, NY 14034-340

/s/ Anne Melton
Anne Melton